

After reviewing the comments from many of the proponents of Broadband over Power Line (BPL) it is apparent this technology is not yet ready for widespread deployment. Further research and innovations in BPL will be needed to avoid the great risk this innovative technology will not cause irreparable interference to services licensed to operate in the 2 MHz - 80 MHz frequency range. Examples of groups who may be harmed by this interference includes:

Persons who have invested in, and enjoy, radio controlled boats, cars (typically operating at 27 MHz) and aircraft (72 and 75 MHz).

Teachers and individuals who explore our solar system for science and to help capture the imagination of our children's minds - Jupiter and the sun emit radio signals in the 20 - 30 MHz range.

The people who rely on the use of the NIST time standard, which broadcasts at 10 MHz.

High frequency amateur radio operators - these people enjoy a hobby that requires a degree of intelligence as well as providing public benefit in emergencies.

In addition, I do not believe this technology is a panacea that will bring the internet to large masses of people. First, there is already softness appearing in the broadband market for DSL and cable providers (see CNN/Money on 8/7/2003). Second, an unusual aspect about the internet as a Mass-communications means is that it is one where the equipment required to receive the signals becomes obsolete and worthless after time. More specifically, a radio designed 70 years ago could still receive the signals broadcast by many commercial stations. A dial telephone designed 50 years ago would still work on most telephone networks (I tried mine and it operated fine!). A television designed in the 50's can still receive the signal from current broadcasters. In contrast, a 386 computer that is 10 years old could not meet today's software requirements. Personal computing still remains an expensive proposition for the individual.

In short, those who seek to benefit from the Approval of ET 03-104 would do so by violating the rights of many people who already have legitimate uses for these bands, and deserve to operate without harmful interference.